

**EXHIBIT B**

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

**AIR FORCE OFFICER, AIR FORCE NCO,** )  
**AIR FORCE SPECIAL AGENT,** and )  
**AIR FORCE ENGINEER,** on behalf of )  
themselves and all others similarly situated, )

Plaintiffs, )

v. )

**LLOYD J. AUSTIN, III,** in his )  
official capacity as Secretary of Defense; )  
**FRANK KENDALL, III,** in his )  
official capacity as Secretary of the Air Force; and )  
**ROBERT I. MILLER,** in his )  
official capacity as Surgeon General of the )  
Air Force, )

Defendants. )

Case No. 5:22-cv-00009-TES

**DECLARATION OF AIR FORCE NCO**

Pursuant to 28 U.S.C. § 1746, I, Air Force NCO, under penalty of perjury declare as follows:

1. I am over the age of eighteen and am competent to make this declaration.
2. My request for religious accommodation as to the COVID-19 vaccine mandate was subject to the Air Force's religious accommodation process. In denying my request, I believe the Air Force failed to make an individualized "to the person" assessment of my accommodation request. I'm personally aware of many other religious objectors who believe they experienced the same.
3. I'm not aware of the Air Force changing what I believe was and is its practice of failing to make an individualized "to the person" assessment of an accommodation request.

4. Under these circumstances, I was hesitant to submit any other religious accommodation requests and to be subject to the Air Force's religious accommodation process again.

5. In August 2023, I retired from the Air Force.

6. I could have retired later, but I chose to retire earlier, because I had sincere religious objections to other vaccines (other than the COVID-19 vaccine) that I expected the Air Force would order me to take in the near future, and I was concerned that the Air Force would subject me to the same religious accommodation process that was in place for the COVID-19 vaccine mandate and would again fail to make an individualized "to the person" assessment of my accommodation request.

7. Leading up to my early retirement, I explained my reasons for retiring early to my chain of command.

8. Early retirement was a sacrifice for me and my family. For example, after I retired, I took a civilian job that required me to move over 1,000 miles away from where I was stationed in the Air Force, and my family and I now live separated due to the scarcity of available affordable housing.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 16, 2024.

/s/ Air Force NCO  
Air Force NCO